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October 25, 2021

**VIA ELECTRONIC COURT FILING**

The Hon. A. David Copperthite  
United States District Court for the District of Maryland  
101 West Lombard Street, 8B  
Baltimore, Maryland 21201

**Re: Alfred Chestnut, et al. v. Donald Kincaid, et al.  
Civil Action No. LKG-20-2342**

Dear Judge Copperthite:

Pursuant to your Letter Order of August 9, 2021 (ECF 52), we write regarding two discovery disputes that Plaintiffs and the Individual Officer Defendants (“Individual Defendants”) have been unable to resolve despite good-faith efforts to do so.

First, there is a dispute regarding Plaintiffs’ previously scheduled depositions of Edward Capers on November 1, 2021, and Ron Bishop on November 3, 2021. Plaintiffs wish to proceed with the depositions as scheduled. Individual Defendants object to proceeding with these depositions because they have not yet received all of the records requested from third parties. The parties met and conferred by telephone regarding this dispute on October 25, 2021, but have reached an impasse.

Second, there is a related dispute concerning Individual Defendants’ desire to seek an extension to the current fact discovery deadline. Plaintiffs object to any extension of the current discovery deadline. The parties met and conferred by telephone regarding this dispute on October 25, 2021, but have reached an impasse.

Plaintiffs and the Individual Defendants will set out their respective positions in submissions, to be filed within 24 hours of this letter.

Respectfully,

/s/

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/s/

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/s/

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